UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE CHINA MEDIAEXPRESS HOLDINGS, INC. SHAREHOLDER LITIGATION

This Document Relates to:

ALL ACTIONS

Civil Action No. 11-cv-0804 (VM)

CLASS ACTION

ECF Case Electronically Filed

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Lead Plaintiffs Irrevocable Trust FBO Lansing Davis and the Davis Partnership LP (collectively, the "Davis Entities" or the "Lead Plaintiff"), and additional plaintiffs John Haughton, Ethan Lamar Pierce and John Shaffer (collectively, the "Class Representatives") respectfully move the Court for an order pursuant to Rules 23(a) and 23(b)(3) of the Federal Rules of Civil Procedure appointing them Class Representatives and certifying this action as a class action on behalf of a class (the "Class") consisting of all those who, between April 1, 2010, and March 11, 2011, inclusive, (the "Class Period") suffered losses as a result of their purchase of shares of CCME common stock, their purchase of CCME call options, and/or their sale of CCME put options (the "Class").

The Class Representatives also seek the appointment of Hagens Berman Sobol Shapiro LLP ("Hagens Berman") as Lead Counsel and of Cohen Milstein Sellers & Toll PLLC ("Cohen Milstein") as Co-Counsel for the Class.

Plaintiffs submit the accompanying memorandum in support of this motion, and the accompanying Declaration of Karl P. Barth in support of this motion.

DATED: August 16, 2013

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By <u>/s/ Karl P. Barth</u> Steve W. Berman

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CERTIFICATE OF SERVICE

I hereby certify that I am the ECF User whose ID and password are being used to electronically file the foregoing with the Clerk of the Court using the CM/ECF system on August 16, 2013, which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ Karl P. Barth KARL P. BARTH

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